

Exhibit 11 to the Fox Declaration

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8 Attorneys for Plaintiffs

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 FRANCIE E. MOELLER et al,

13 Plaintiffs,

14 v.

15 TACO BELL CORP.,

16 Defendant.

Case No. C 02 5849 MJJ ADR

DECLARATION OF FRANCIE
MOELLER

17 I, Francie Moeller, do hereby declare that:

18 1. Due to multiple disabilities, I use a scooter for mobility.

19 2. I am active in my community and my state. I am the Chair of the Disability
20 Caucus of the California Democratic Party. In addition, I was elected to the Sonoma County
21 Central Committee for the California Democratic Party. I am a past chair of the Bay Valley
22 District Organization of Business and Professional Women, and I am an advisor to, and a
23 member of, California NOW.

24 3. I am also involved in several organizations that advocate for the rights of

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26 Declaration of Francie Moeller

1 persons with disabilities. I am a member of Californians for Disabled Rights, and I am
2 currently running for a position on the Executive Committee of that organization. I am a
3 member of the California Disability Alliance. In addition, I am a speaker on the civil rights
4 panel of the Respectability Conference, a conference held in October and attended by more
5 than 200 organizations that address disability-related issues.

6 4. I frequently have encountered accessibility barriers at Taco Bell restaurants in
7 California, including the restaurants located at 1416 Farmers Lane, 771 Stony Point Road, and
8 1835 Mendocino Avenue in Santa Rosa.

9 5. These accessibility barriers include designated handicap parking spaces and
10 access aisles that are too narrow to allow me to deploy my ramp, designated handicap parking
11 located in an area that requires me to cross traffic lanes to get to the restaurant, improper or
12 missing accessibility signage, doors that are too heavy for me to open, queue lines that are too
13 narrow for me to get through in my scooter, a lack of accessible seating, no space to turn
14 around in once I am in the dining area, drink and condiment dispensers that are beyond my
15 reach, and inaccessible bathrooms.

16 6. I understand that I am a representative of the class in this case, and I intend to
17 vigorously prosecute this case on behalf of the class.

18 I declare under penalty of perjury that the foregoing is true and correct.

19
20
21 DATE: Sept. 4, 2003 /s/ Francie Moeller
22 Francie Moeller
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